

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JESSE SIERRA and  
DUSTIN SIERRA,

Defendants.

CR 19-50110

REDACTED INDICTMENT

Kidnapping

(18 U.S.C. §§ 1201(a)(2), 1153,  
and 2)

Aggravated Sexual Abuse by Force  
(18 U.S.C. §§ 2241(a)(1), 2246(2)(A),  
1153, and 2)

Aggravated Sexual Abuse by Force  
(18 U.S.C. §§ 2241(a)(1), 2246(2)(B),  
1153, and 2)

Interstate Domestic Violence  
(18 U.S.C. §§ 2261(a)(2) and 2)

Assault Resulting in Serious Bodily  
Injury  
(18 U.S.C. §§ 113(a)(6), 1153, and 2)

Assault by Strangulation of a Dating  
Partner  
(18 U.S.C. §§ 113(a)(8), 1153, and 2)

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The Grand Jury charges:

COUNT I:

On or about between July 13, 2019, and July 21, 2019, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, the Defendants, Jesse Sierra and Dustin Sierra, Indian persons, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom or reward or otherwise Esther Wolfe, and did aid, abet, counsel,

command, induce, and procure the commission of the offense, all in violation of 18 U.S.C. §§ 1201(a)(2), 1153, and 2.

COUNT II:

On or about between July 13, 2019, and July 21, 2019, inclusive, near Oglala and elsewhere, in Indian Country, in the District of South Dakota, the Defendants, Jesse Sierra and Dustin Sierra, Indian persons, did knowingly cause and attempt to cause Esther Wolfe to engage in a sexual act by using force against Esther Wolfe and did aid, abet, counsel, command, induce, and procure the commission of the offense, all in violation of 18 U.S.C. §§ 2241(a)(1), 2246(2)(A), 1153, and 2.

COUNT III:

On or about between July 13, 2019, and July 21, 2019, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, the Defendants, Jesse Sierra and Dustin Sierra, Indian persons, did knowingly cause and attempt to cause Esther Wolfe to engage in a sexual act by using force against Esther Wolfe and did aid, abet, counsel, command, induce, and procure the commission of the offense, all in violation of 18 U.S.C. §§ 2241(a)(1), 2246(2)(B), 1153, and 2.

COUNT IV:

On or about between July 13, 2019, and July 21, 2019, inclusive, the Defendants, Jesse Sierra and Dustin Sierra, did cause Esther Wolfe, an intimate partner of Jesse Sierra as defined in 18 U.S.C. § 2266(7)(A)(i), to enter and leave

Indian country, to wit: the Pine Ridge Reservation, in the District of South Dakota, by force, coercion, duress, and fraud, and did, in the course of, as a result of, and to facilitate such conduct or travel, commit and attempt to commit a crime of violence against Esther Wolfe, and did aid, abet, counsel, command, induce, and procure the commission of the offense, all in violation of 18 U.S.C. §§ 2261(a)(2) and 2.

COUNT V:

On or about between July 13, 2019, and July 21, 2019, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, the Defendants, Jesse Sierra and Dustin Sierra, Indian persons, did unlawfully assault Esther Wolfe, said assault resulting in serious bodily injury, and did aid, abet, counsel, command, induce, and procure the commission of the offense, all in violation of 18 U.S.C. §§ 113(a)(6), 1153, and 2.

COUNT VI:

On or about between July 13, 2019, and July 21, 2019, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, the Defendants, Jesse Sierra and Dustin Sierra, Indian persons, did assault Esther Wolfe, an intimate partner of Jesse Sierra as defined in 18 U.S.C. § 2266(7)(A)(i), by strangling, suffocating, and attempting to strangle and suffocate her, and did aid, abet, counsel, command, induce, and procure the commission of the offense, all in violation of 18 U.S.C. §§ 113(a)(8), 1153, and 2.

COUNT VII:

On or about between August 28, 2018, and August 29, 2018, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, the Defendant, Jesse Sierra, an Indian person, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom or reward or otherwise Esther Wolfe, all in violation of 18 U.S.C. §§ 1201(a)(2) and 1153.

COUNT VIII:

On or about between August 28, 2018, and August 29, 2018, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, the Defendant, Jesse Sierra, an Indian person, did knowingly cause and attempt to cause Esther Wolfe to engage in a sexual act by using force against Esther Wolfe, all in violation of 18 U.S.C. §§ 2241(a)(1), 2246(2)(A), and 1153.

COUNT IX:

On or about between August 28, 2018, and August 29, 2018, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, Jesse Sierra, an Indian person, did unlawfully assault Esther Wolfe, said assault resulting in serious bodily injury, all in violation of 18 U.S.C. §§ 113(a)(6) and 1153.

COUNT X:

On or about between August 28, 2018, and August 29, 2018, inclusive, the Defendant, Jesse Sierra, did cause Esther Wolfe, an intimate partner of Jesse Sierra as defined in 18 U.S.C. § 2266(7)(A)(i), to enter and leave Indian country,

to wit: the Pine Ridge Reservation, in the District of South Dakota, by force, coercion, duress, and fraud, and did, in the course of, as a result of, and to facilitate such conduct or travel, commit and attempt to commit a crime of violence against Esther Wolfe, all in violation of 18 U.S.C. § 2261(a)(2).

COUNT XI:

On or about between August 28, 2018, and August 29, 2018, inclusive, near Oglala and elsewhere, in Indian country, in the District of South Dakota, the Defendant, Jesse Sierra, an Indian person, did assault Esther Wolfe, an intimate partner of Jesse Sierra as defined in 18 U.S.C. § 2266(7)(A)(i), by strangling, suffocating, and attempting to strangle and suffocate her, all in violation of 18 U.S.C. §§ 113(a)(8) and 1153.

A TRUE BILL:

**NAME REDACTED**

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Foreperson

RONALD A. PARSONS, JR.  
United States Attorney

By: \_\_\_\_\_

